

UNITED STATES DISTRICT COURT FOR THE

SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION

UNITED STATES OF AMERICA

PLAINTIFF,
VS.

CESAR TRUJILLO

DEFENDANT

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CASE NO. 7:20-CR-591- 1

MOTION FOR PERMISSION TO TRAVEL

TO THE HONORABLE JUDGE MICAELA ALVAREZ, UNITED STATES DISTRICT
JUDGE FOR THE SOUTHERN DISTRICT OF TEXAS, MCALLEN DIVISION:

COMES NOW, CESAR TRUJILLO, and moves the court for permission to travel
to Austin, Texas with his family for the Labor Day weekend and in support Defendant
shows as follows:

1. This case is set for final Pre-Trial on October 28, 2020 at 9:00 a.m. jury
selection is scheduled for November 3, 2020 at 9:00 a.m.. Defendant was released on an
unsecured bond on March 4, 2020. One of his bond conditions is that travel is restricted
to the Southern District of Texas. Mr. Trujillo is requesting permission from the court to
travel to Austin, Texas with his family for the Labor Day weekend. Austin, Texas is in
the Western District of Texas. If permission is granted he will leave with his family on
September 4, 2020 in the afternoon. He will return to Houston on September 6, 2020 in
the afternoon. He can always be reached on his cell phone which is 832-531-3696. In

Austin, Texas he will be staying with his family at a Court Yard by Marriott which is located at 12833 Ranch, Rd. 620 N., Austin, Texas 78750. Family members include his mother and father and siblings.

2. The governments oppose this motion. The U.S. Pre-trial officer, in Houston, Texas Michael Cannon, does not oppose this motion.

WHEREFORE, PREMISES CONSIDERED, the Defendant prays this Honorable Court to grant this Motion for Permission to Travel.

Respectfully submitted,
/s/ David R. Bires
DAVID R. BIRES
TBA No. 02335000
Federal Id No. 3666
3714 Audubon Place
Houston, Texas 77006
Telephone: (713) 526-9575
Facsimile: (713) 524-2672
Email: DavidRBires@mail.com

Attorney for Defendant,
CESAR TRUJILLO

CERTIFICATE OF CONFERENCE

On September 3, 2020, Counsel for Defendant, conferred with AUSA Robert Guerra concerning his position on the Defendant's Motion for Permission to Travel. Mr. Guerra stated he opposes this motion.

On September 3, 2020, Counsel for Defendant, conferred with U.S. Pre-Trial officer Michael Cannon who is not opposed to this motion.

/s/ David R. Bires
DAVID R. BIRES

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on September 3, 2020, I electronically filed the foregoing Motion for Permission to Travel with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties. A copy of this motion is being emailed to A.U.S.A Robert Guerra at the time of filing.

/s/ David R. Bires
DAVID R. BIRES